



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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October 19, 2015

Mr. Rick Henderson
Terramar Retail Centers
5918 Stoneridge Mall Road
Pleasanton, CA 94588
(Sent via email to rick.henderson@terramarcenters.com)

Subject: Conditional Interim Remedial Action Plan Approval; Site Cleanup Program Case No. RO0003172 and Geotracker Global ID T10000007048, Rockridge Shopping Center, 5100 Broadway, Oakland, CA 94611

Dear Mr. Henderson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Additional Remedial Investigation Report and Proposed Interim Remedial Action Plan* (IRAP), dated October 12, 2015. The report was submitted on your behalf by Tetra Tech, Inc. (Tetra Tech). Thank you for submitting the work plan.

The referenced documents detailed the findings of the installation of soil bores DC-SB-15 to DC-SB-26, the collection of soil and grab groundwater samples, and the installation of vapor wells DC-VMP-9 to DC-VMP-20, and the collection of shallow and deeper soil vapor samples at the site. The interim remedial action plan proposes to excavate an area approximately 45 feet by 35 feet by 6 to 8 feet in depth as an interim remedial action in the area of the release of tetrachloroethene (PCE). The area of an existing electrical transformer will not be excavated at the present time, but data will be collected and evaluated for future removal after the transformer is deactivated and removed in mid-November 2015.

Due to the potential human health risk associated with the PCE release, and the limited window of time available for the remedial excavation, it appears appropriate to undertake the proposed actions. Based on ACEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Work Plan Modifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests one modification to the approach. Please submit a report by the date specified below.
 - a. **Soil Sample Collection Protocols** – The work plan proposes to collect and retain for laboratory analysis multiple sidewall and bottom confirmation soil samples to be collected in 9-ounce glass jars. To minimize or eliminate aeration of the soil samples, ACEH requests that all soil samples be collected in 2 by 6-inch sample metal tubes driven directly into a relatively undisturbed soil samples. The samples should be sealed and placed in a chilled cooler for transport to the analytical laboratory of choice.
 - b. **Confirmation Samples** – IRAP proposed the collection of 10 confirmation soil samples from the sidewalls and excavation bottom, at a depth of three feet below grade (bgs). The highest concentrations of PCE were consistently encountered at a depth of 1 foot bgs in recent soil bores;

thus in order to ensure the successful removal of the PCE impacted soil ACEH requests that sidewall samples be collected every 20 linear feet of the excavation, at the depths of one and three feet bgs. Additionally, please positively bias bottom samples to bore locations that documented higher concentrations (e.g. DC-SB-10).

- c. Vapor Monitoring Suppression** – To ensure that dust and PCE vapors are eliminated or are below applicable regulatory goals, please ensure sufficient moisture (or other appropriate suppressant) is applied prior to and during excavation. The proposed monitoring of vapor emissions appears appropriate; however, if ambient air readings exceed a total VOC concentration of 10 ppmv, ACEH requests a halving, or less, of the interval until vapor concentrations decrease significantly, or the temporary cessation of excavation activities until vapor concentrations abate.
 - d. Backfill Material** – To ensure that imported soil to be used as backfill for the excavations is suitable for the purpose, ACEH requests that any imported soil be analyzed in conformance with the Department of Toxic Substances Control (DTSC) *Clean Imported Fill Material Information Advisory*, dated October 2001. Should recycled base rock be considered for use, please ensure the recycled material is tested in conformance with the New Jersey Department of Environmental Protection *Guidance for Characterization of Concrete and Clean Material Certification for Recycling*, dated January 12, 2010. Copies of either document can be forwarded under separate cover.
- 2. Geotracker Compliance** - A review of the case file and the State's Geotracker database indicates that the site is not in full compliance with state Geotracker requirements. Compliance is a State requirement. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including SLIC programs. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker. At present missing data and documents include, but may not be limited to EDF submittals, GEO MAPS, and all bore logs. Please see Attachment 1 for limited additional details, and the state GeoTracker website for full details. ACEH requests notification of uploads to Geotracker. Please be aware that the lack of a response can delay site closure. Please upload the required items by the date identified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **December 11, 2015** – Geotracker Compliance
Email notification of Case Worker is requested.
- **December 11, 2015** – Remedial Progress Report
File to be named: RO3172_REM_R_yyyy-mm-dd

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

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If you have any questions, please do not hesitate to call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Tim Costello, Tetra Tech, Inc, 2969 Prospect Park Drive, Suite 100, Rancho Cordova, CA 95670;
(Sent via E-mail to: timothy.costello@tetrattech.com)

Keith Hoofard, Tetra Tech, Inc, 2969 Prospect Park Drive, Suite 100, Rancho Cordova, CA 95670;
(Sent via E-mail to: keith.hoofard@tetrattech.com)

Stephen Carlton, Tetra Tech, Inc, 2969 Prospect Park Drive, Suite 100, Rancho Cordova, CA 95670; (Sent via E-mail to: stephen.carlton@tetrattech.com)

Dilan Roe, ACEH, (Sent via electronic mail to dilan.roe@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Electronic File, GeoTracker

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

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| Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) | REVISION DATE: May 15, 2014 |
| | ISSUE DATE: July 5, 2005 |
| | PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010 |
| SECTION: Miscellaneous Administrative Topics & Procedures | SUBJECT: Electronic Report Upload (ftp) Instructions |

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to deh.loptoxic@acgov.org
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to deh.loptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.